

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION

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DEBRA P. HACKETT, CLK  
U.S. DISTRICT COURT  
MIDDLE DISTRICT ALA

SHAWN REAVES on behalf of  
him and others similarly situated,

Plaintiff,

vs.

Case No.: 3:05-CV-900-WKW

WILDCAT INVESTMENTS, LLC,  
AND B&B FOODS, L.L.C.

Defendants.

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**DEFENDANTS' MOTION FOR LEAVE TO FILE  
AN ADDITIONAL APPEARANCE *PRO HAC VICE***

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Defendants, **WILDCAT INVESTMENTS, LLC and B&B FOODS, L.L.C.**, by and through their attorneys Gregory H. Andrews and Leslie J. Johnson of **ANDREWS KOEHLER & PASSARELLI, P.C.**, hereby move this Honorable Court to grant their Motion For Leave To File An Additional Appearance *Pro Hac Vice*. In support of their Motion, Defendants state as follows:

1. On November 16, 2005, the Court granted Defendants' Motion For Leave To File Appearance *Pro Hac Vice* for Gregory H. Andrews, Isham R. Jones, III and Kerry Lin Davidson of the law firm of Andrews Koehler & Passarelli, P.C. to represent Defendants in the above-referenced action.

2. Within the last six months, Isham R. Jones, III and Kerry Lin Davidson have terminated their employment with Andrews Koehler & Passarelli, P.C. and have withdrawn their appearances in this action.

3. Because of Attorney Jones and Attorney Davidson's recent departures, Defendants seek leave to file an additional appearance of counsel *pro hac vice*.

4. Leslie J. Johnson is a labor and employment lawyer at Andrews Koehler & Passarelli, P.C. She seeks to file her Additional Appearance *Pro Hac Vice* on Defendants' behalf.

5. Rule 83.1 (b) of the Local Rules of United States District Court for the Middle District of Alabama states in pertinent part:

Appearance Pro Hac Vice. Any attorney who is not a member of the Bar of this Court but who is admitted to practice before the United States District Court for the district in which such person resides or regularly practices law, may, upon request, be admitted pro hac vice by an order of any district judge, magistrate judge, or bankruptcy judge of this Court.

3. Although Attorney Johnson is not a member of the Bar of the United States District Court for the Middle District of Alabama, she is a member in good standing in the Bar of the United States District Court of the Northern District of Illinois and is not under suspension or subject to any discipline with respect to their law practice before that court or any other federal or state court. See Certificate of Good Standing, attached hereto as Exhibit 1.

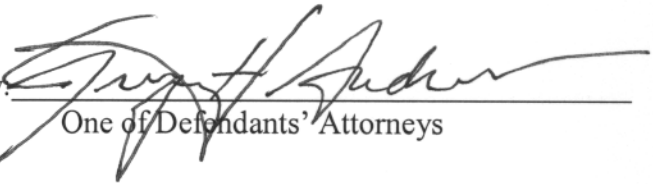
6. Furthermore, Attorney Johnson only seeks to represent Defendants in the above-referenced action brought by Plaintiff and pending in this Court and is not currently appearing on a *pro hac vice* basis in any other matter in any court located in the State of Alabama.

7. Defendants' Proposed Order granting their Motion For Leave To File Additional Appearance *Pro Hac Vice* is attached hereto as Exhibit 2.

WHEREFORE, Defendants respectfully requests that this Court grant their Motion For Leave To File An Additional Appearance *Pro Hac Vice* and further grant them any other relief that this Court deems just and equitable.

Respectfully submitted this 14th day of August, 2006.

**WILDCAT INVESTMENTS, LLC,  
and B&B FOODS, L.L.C.**

By:   
One of Defendants' Attorneys

Gregory H. Andrews (ILARDC 6209480)  
Leslie J. Johnson (ILARDC 6277732)\*  
ANDREWS KOEHLER & PASSARELLI, P.C.  
4343 Commerce Court, Suite 615  
Lisle, Illinois 60532  
Telephone: (630) 505-9939  
Facsimile: (630) 505-9969

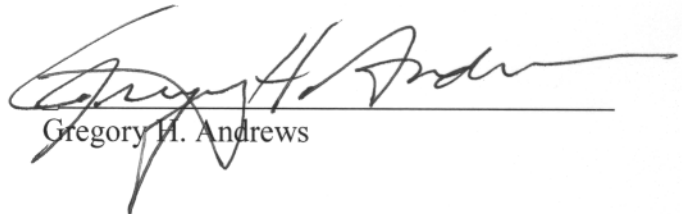
**ATTORNEYS FOR DEFENDANTS**

\* *Admission to appear pro hac vice pending.*

**CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that he served a true and correct copy of **DEFENDANTS' MOTION FOR LEAVE TO FILE AN ADDITIONAL APPEARANCE** *PRO HAC VICE* upon the below-noticed individual(s) via U.S. Mail, first class postage prepaid on this 14<sup>th</sup> day of August, 2006.

Jon C. Goldfarb (GOL015)  
Maury S. Weiner (WEI021)  
Kell Simon (SIM061)  
Wiggins, Childs, Quinn & Pantazis, LLC  
The Kress Building  
301 19<sup>th</sup> Street North  
Birmingham, Alabama 35203



Gregory H. Andrews